	Connecting for Health Common Framework	Washington State Health Information Infrastructure Requirements	Connecting for Health Common Framework											
	Policy Guides		Description	Framew	ork Priva	cy Princ	iples (2= O	ECD, 3=	Canada)					
P2	Model Privacy Policies & Procedures for HIE		A foundational policy architecture for privacy and health information technology in a networked environment, based on nine principles. The Connecting for Health approach dictates that these nine principles be balanced to avoid emphasizing some over others in a way that would weaken the approach.	Patients Own Their Own HI	Individual Participation (2) & Control (3)	Openness (2,3) & Transparency	Purpose Specification (2,3) & Minimization	Collection Limitation (2,3)	Use Limitation (2,3)	Data Integrity (3) & Quality (2,3)	Security Safeguards (2,3) & Controls	Accountability (2,3) & Oversight	Remedies	Retention (3)
SNO Policy 100	Compliance with Law & Privacy	Privacy, Confidentiality, & Security	Participants comply with applicable law and SNO policies. Participants promulgate the internal policies required for such compliance. The policy that is the most protective of individual privicy should govern decision making. Participants may enhance privacy protection where appropriate.	x		x				x		x	x	
SNO Policy 200	Notice of Privacy Practices	Privacy, Confidentiality, & Security	Incorporates HIPAA requirements obligating entities to provide individuals a notice of the entities privacy practices. The policy exceeds HIPAA requirements by also requiring disclosures to individuals of certain information related to the SNO and RLS. The policy applies to all participants that have registered with and are participating in the SNO and RLS and that may provide and or make available health information through the SNO and the RLS.	x	x	x	x	x	х					
SNO Policy 300	Individual Participation & Control of Info. Posted to RLS		Allows individuals to elect whether or not to have information about them included in the RLS Individuals are treated as participants in the process of health information collection and dissemination rather than as spectators. Includes sub-policy statements: Choice Not to Have Information Included in the RLS; Effect of Choice; Revocation; Documentation; Participant Choice; Provision of Coverage or Care.	x	x		х	x	x					

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SNO Policy 400	Uses & Disclosures of Health Information	Functions, Privacy, Confidentiality, & Security	All uses will be consistent with applicable State, Federal and local laws and regulations. Restricts the purposes for which the Participant may request PHI. Permissable purpose must be stated with request for information. Includes pertinent policies re: SNO Policies; Participant Policies; Accounting Disclosures; Audit Logs; Authentication; Access				x	x	x		x			
SNO Policy 500	Information Subject to Special Protection	Functions	This provision facilitates individualized privacy protections by requiring Participants to heed any special protections of certain information set forth under applicable law.	x	х		x	х	х	х	x			
SNO Policy 600	Minimum Necessary	Function	Incorporates the HIPAA requirement that entities may disclose only the amount of information that is reasonably necessary to achieve a specific purpose. The policy exempts treatment disclosures from this minimum necessary requirement to balance the protection of privacy and the provision of quality health care. Includes subpolicy statements re: Uses; Disclosures; Requests; Entire Medical Record					x	x	x	х			
SNO Policy 700	Workforce, Agents, & Contractors	Functions	This recommended model policy advances privacy principles .						x	х	х	х	x	
SNO Policy 800	Amendment of Data	Functions	Allows indivuiduals to verify the accuracy and completeness of information concerning them		х	х				х		х		
SNO Policy 900	Requests for Restrictions	Functions, Privacy, Confidentiality, & Security	Requires participants who agree to individuals' requests for restrictions in accordance with HIPAA Privacy Rule to comply with such request with regard to the release of information.		х				х			x		

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SNO Policy 1000	Mitigation	Privacy, Confidentiality, & Security	Essential both to reassure individuals that Participants are vigilant in addressing privacy violations and to help Participants ensure that their data oversight practices and security measures are functioning and effective.								x	х	х	
P3	Notification & Consent when Using a Record Locator Service		Proposed sytematic and architectural approach to resolving the issues re: protecting medical privacy and confidentiality in context of the RLS. The foundations of the approach depend on the balanced inmplementation of the nine principles associated with fair information practices.		x	x	х	x	x	x	x	х	x	
P4	Correctly Matching Patients with their Records		Based on HIPAA privacy regulations and security standards. (technical and policy specifications) Outlines a set of policies for matching patient records with demographic details so as to minimize incidental disclosures of PHI within a nationwide electronic health information exchange.								х	х	x	
P5	Authentication of System Users		Recommended approaches for SNO participants to establish user identity for the purpose of access to health information.											
P6	Patient Access to Their Own HI		The discussion includes a review of the state of the current law on individuals' access to their own health care information and then makes recommendations regarding such policies in the context of a Record Locator Service and a health information sharing environment.											
P7	Auditing Access to and use of a Health Information Exchange		The advantages and disadvantages of audit logs, some criteria for successful audit logs, and issues that sub-network organizations should consider in implementing successful audit systems.											

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P8	Breaches of Confidedent		Recommended policies for addressing breaches in											
	Health Information		confidentiality of personal health information.											
P9	A Common Framework for Networked PHI													